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July 13, 2021

VIA E-FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, Delaware 19801

**Re: Crystallex International Corporation v. Bolivarian Republic of Venezuela et al.,
C.A. No. 17-mc-151-LPS**

Dear Judge Stark:

We write to respectfully inform the Court of ConocoPhillips' concern that the recent report filed by the Special Master, which seeks approval of approximately \$1.2 million in fees for just the second month of the engagement, brings the total amount of fees sought to approximately \$1.7 million out of the \$2 million cap provided for in the May 27, 2021 Order Appointing Special Master. We note that certain of the fees, including Mr. Pincus', are quite modest, and we have no objection to the payment of those fees. However, the amount charged by the Special Master's consultants and advisors (including but not limited to a charge of \$740,433.05 for a month of work by just one of the three law firms retained by the Special Master) is, in ConocoPhillips' view, quite steep—particularly considering that there is not yet even a draft of a proposed order that has been shared with the parties and ConocoPhillips.

ConocoPhillips does not at this time request that the Court deny approval of the Special Master's fees. However, ConocoPhillips does object to the rate at which the Special Master is accruing fees and reserves all rights with respect to further payments of fees.

While ConocoPhillips does not request briefing on this issue, should the Court wish to see additional briefing, we propose that the parties submit letter briefs no later than July 19, with any response due by July 26.

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We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Garrett B. Moritz

Garrett B. Moritz (#5646)

cc: All Counsel of Record
Robert Pincus, Special Master